

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**SOVEREIGN BANCORP, INC., et al.**

**Plaintiffs,**

**vs.**

**JOHN H. HARLAND COMPANY,**

**Defendant.**

**Civil Action No. 04-11631-EFH**

**PLAINTIFFS' LOCAL RULE 16.1(D)(3) CERTIFICATION**

Pursuant to the provisions of Local Rule 16.1(D)(3), plaintiffs and their counsel hereby certify that they have conferred:

- (a) with a view to establishing a budget for the cost of conducting the full course and various alternative courses of the litigation; and
- (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

**ROBINSON & COLE LLP**

**PLAINTIFFS,  
SOVEREIGN BANCORP, INC., et al.**

/s/ John W. Steinmetz  
Steven B. Rotman, BBO # 558473  
John W. Steinmetz, BBO # 568108  
Paula S. Bliss, BBO # 652361  
ROBINSON & COLE LLP  
One Boston Place  
Boston, MA 02108-4404  
(617) 557-5900

/s/ Gary Deutsch  
By: Gary A. Deutsch, Esq.  
Its: Litigation Counsel